

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

*Plaintiff,*

v.

SAMSUNG ELECTRONICS CO., LTD.,  
SAMSUNG ELECTRONICS AMERICA,  
INC.,

*Defendants.*

Civil Action No. 2:23-cv-00103-JRG-RSP

**JURY DEMANDED**

**JOINT MOTION FOR ENTRY OF AGREED DISCOVERY ORDER**

Pursuant to the Court's Order setting a deadline to file a proposed Discovery Order (D.I. 41) and extension thereto (D.I. 53), Plaintiff Headwater Research, LLC and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. hereby jointly request that the Court enter the proposed Discovery Order, attached hereto as Exhibit A.

Dated: October 27, 2023

Respectfully submitted,

/s/ Marc Fenster

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**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 27<sup>th</sup> day of October 2023, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Marc Fenster  
Marc Fenster

**CERTIFICATE OF CONFERENCE**

The undersigned certifies that counsel complied with the requirements of Eastern District of Texas Local Rule CV-7(h). The parties are in agreement on filing this Joint Motion.

/s/ Marc Fenster  
Marc Fenster